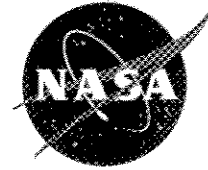


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



January 13, 2010

Reply to Attn of General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Space Transportation Association (STA) Breakfast on January 15, 2010

On January 15, 2010, the Space Transportation Association (STA), will host a breakfast with Matt Mountain and John Grunsfeld, Director and Deputy Director of the Space Telescope Science Institute at 325 Russell Office Building, in Washington, D. C. , from 7:30a.m.-9:00a.m. Co-sponsors of the event include Aerojet, ATK, Ball, Boeing, ITT, Lockheed Martin, QinetiQ, Paragon, Pratt & Whitney Rocketdyne, ULA, United Space Alliance, and Wyle.

The breakfast will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, Congress, academia, and other Federal agencies. Approximately 300 people have been invited and 30 are expected to attend. The estimated cost of the meal, which includes all food and beverages, is \$25.00 per person. I find that the STA event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the breakfast will allow NASA representatives to discuss NASA's programs and plans with other attendees following Matt Mountain and John Grunsfeld remarks. Accordingly, NASA employees whose duties do not substantially affect STA or a majority of all of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

However, NASA employees who are in non-career positions in which Executive Order 13490, requires signing an ethics pledge, may only attend if they reimburse the sponsor the cost of the reception for themselves and accompanying guests. Moreover, NASA employees whose duties do not substantially affect STA, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. §2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written over a horizontal line.

Adam F. Greenstone